

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

---

UNITED STATES OF AMERICA,

v.

JOEL HERNANDEZ-MARTINEZ,

Defendant.

---

**16-CR-178-FPG**

**NOTICE OF MOTION**

**MOTION BY:**

Jeffrey T. Bagley, Assistant Federal Public  
Defender

**DATE, TIME & PLACE:**

Before the Honorable Frank P. Geraci, United  
States District Court Chief Judge, Robert H.  
Jackson United States Courthouse, 2 Niagara  
Square, Buffalo, New York, **on the papers  
submitted.**

**SUPPORTING PAPERS:**

Affirmation of Assistant Federal Public Defender  
Jeffrey T. Bagley, dated April 18, 2017.

**RELIEF REQUESTED:**

Sealing of Defendant's Sentencing Memorandum.

**DATED:**

Buffalo, New York, April 19, 2017

**/s/ Jeffrey T. Bagley**

Jeffrey T. Bagley  
Assistant Federal Public Defender  
Federal Public Defender's Office  
300 Pearl Street, Suite 200  
Buffalo, New York 14202  
(716) 551-3341, (716) 551-3346 (Fax)  
jeffrey\_bagley@fd.org  
*Counsel for Defendant Joel Hernandez-Martinez*

**TO:** Brian J. Counihan  
Assistant United States Attorney

Lindsay M. Maza  
United States Probation Officer

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

---

UNITED STATES OF AMERICA,

**16-CR-178-FPG**

v.

**AFFIRMATION**

JOEL L. HERNANDEZ-MARTINEZ,

Defendant.

---

**JEFFREY T. BAGLEY**, affirms under penalty of perjury that:

1. I am an Assistant Federal Public Defender for the Western District of New York and was assigned to represent the above-named defendant, Joel Hernandez-Martinez.

2. There is confidential information contained in the defendant's Sentencing Memorandum, and therefore, the defense is requesting that it be filed under seal.

**WHEREFORE**, it is respectfully requested that the defendant's Sentencing Memorandum be filed under seal.

**DATED:** Buffalo, New York, April 18, 2017.

Respectfully submitted,

/s/ Jeffrey T. Bagley

Jeffrey T. Bagley  
Assistant Federal Public Defender  
Federal Public Defender's Office  
300 Pearl Street, Suite 200  
Buffalo, New York 14202  
(716) 551-3341, (716) 551-3346 (Fax)  
jeffrey\_bagley@fd.org  
*Counsel for Defendant Joel Hernandez-Martinez*

**TO:** Brian J. Counihan  
Assistant United States Attorney

Lindsay M. Maza  
United States Probation Officer

